LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W. SUITE 1200

WASHINGTON, D.C. 20036 (202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA

STEVEN M. CHERNOFF

August 1, 2003

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ

OF COUNSEL
JOHN J. MCAVOY
J.K. HAGE III+
LEONARD S. KOLSKY+
HON. GERALD S. MCGOWAN

TELECOPIER (202) 857-5747

http://www.fcclaw.com

(202) 828-8434 tslamowitz@fcclaw.com

Via Hand Delivery

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

Re: Alaska DigiTel, LLC. E911 Interim Report

Dear Ms. Dortch:

Alaska DigiTel, LLC ("Alaska DigiTel") hereby files its E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status.

Alaska DigiTel recognizes the public safety importance of Phase II E911 service. It provides digital wireless service in rural Alaska; specifically serving Anchorage, Juneau, Fairbanks, Mat Su Valley, and Kenai Peninsula. It operates a CDMA network, serving approximately 16,000 subscribers. It also operates a roam-only GSM network in a portion of Anchorage. As set forth below, Alaska DigiTel provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers).

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

Alaska DigiTel has received a PSAP request from the Anchorage PSAP dated May 15, 2003. The Anchorage PSAP's request notified them that it expects to have Phase I and II capabilities by the end of 2003. However, subsequent conversations with the Anchorage PSAP indicate that they may not have these capabilities within the proposed timeframe.

2. The carrier's specific technology choice (*i.e.*, network-based or handset-based solution, as well as the type of technology used).

At this time, Alaska DigiTel plans on deploying a handset-based solution for its CDMA network. With respect to its GSM network, it has not selected a solution since it has no GSM subscribers at this time.

3. Status on ordering and/or installing network equipment.

At this time, the PSAP's in Alaska DigiTel's service area are not yet capable of receiving Phase I or Phase II service. Nonetheless, Alaska DigiTel's CDMA network is Phase I capable. However, based upon price quotes already received from a vendor, the connectivity costs associated with delivering Phase I service to the PSAPs will be substantial. In order to become Phase II capable utilizing a handset-based technology, Alaska DigiTel must make several upgrades to its CDMA network, including both software and hardware upgrades. It currently is negotiating with several vendors regarding the necessary upgrades. Alaska DigiTel expects the costs of the upgrades to be substantial, and as a small carrier, it has limited funding options. Thus, it expects the financial requirements to become both Phase I and Phase II compliant to place a severe strain on its proposed E911 roll-out plans. As for its GSM network, Alaska DigiTel is Phase I capable. Its vendor is in the process of determining if its GSM network can be upgraded to provide Phase II service. If so, Alaska DigiTel expects the costs to be in line with the costs associated with Phase I implementation on its GSM network.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

ALI-capable handsets for CDMA networks are currently available. Alaska DigiTel is in the process of determining which handsets will be best suited for their subscribers. Nonetheless, it is premature for Alaska DigiTel to enter into any agreements with handset vendors as it must first complete the necessary upgrades to its CDMA network.

5. The estimated date on which Phase II service will first be available in the carrier's network.

Alaska DigiTel anticipates being able to provide Phase I and Phase II E911 service to its subscribers by June 30, 2005.

6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

By December 31, 2005, Alaska DigiTel anticipates that 100 percent of all new handsets sold will be ALI-capable. However, ultimate implementation will require Alaska DigiTel to convert a majority of its current subscribers to ALI-capable handsets in order to meet the 95 percent penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's rules. Based on the number of CDMA subsribers, the costs associated with implementing Phase I and Phase II service,

and the onerous task of converting its current CDMA subscribers to location-capble handsets,, Alaska DigiTel believes it won't be able to meet this requirement.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,

200 ケーケ Thomas Gutierrez

Todd Slamowitz

AFFIDAVIT

| County of Shelby |) |) | |
|--------------------|---|-----|--|
| |) | SS: | |
| State of Tennessee |) | | |

- I, Stephen M. Roberts, having been first duly sworn, depose and state as follows:
- 1. I am Managing Director and Corporate Secretary for Alaska Digitel, LLC.
- 2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Stephen M. Roberts

Managing Director, Secretary

Alaska Digitel, LLC

Subscribed to and sworn to before me

this 31 day of July

2003

Notary Public

My commission expires:

MY COMMISSION EXPIRES JULY 28, 2004

CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, delivered a copy of the foregoing Enhanced 911 Tier III Interim Report to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

David Solomon, Chief*
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C723
Washington, D.C. 20554

Blaise Scinto, Acting Chief*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C133
Washington, D.C. 20554

Jennifer Tomchin, Legal Advisor*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C400
Washington, D.C. 20554

Patrick Forster*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A104
Washington, D.C. 20554

Robert M. Gurss
Director of Legal and Government Affairs
APCO International
1725 DeSales Street, NW, Suite 808
Washington, D.C. 20036
Counsel for APCO

James R. Hobson Miller & Van Eaton, P.L.L.C. 1155 Connecticut Ave. N.W., Suite 1000 Washington, D.C. 20036 Counsel for NENA and NASNA

John Ramsey, Executive Director APCO International, Inc. World Headquarters 351 N. Williamson Blvd. Daytona Beach, FL 32114-1112

Jim Goerke, Interim Executive Director NENA 422 Beecher Rd. Columbus, OH 43230

Evelyn Bailey, Executive Director, NASNA Vermont Enhanced 9-1-1 Board 94 State Street Drawer 20 Montpelier, VT 05620-6501

Steven McCord

^{*}via hand-delivery